



## Notice of Service of Process

null / ALL  
Transmittal Number: 23309360  
Date Processed: 06/07/2021

**Primary Contact:** Tanya Flores  
Midland Credit Management, Inc.  
350 Camino de La Reina  
Ste 100  
San Diego, CA 92108-3007

**Electronic copy provided to:** Krista Yerby

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<b>Entity:</b>	Midland Credit Management, Inc Entity ID Number 1682419
<b>Entity Served:</b>	Midland Credit Management, Inc.
<b>Title of Action:</b>	Linda Vorek vs. Midland Credit Management, Inc.
<b>Matter Name/ID:</b>	Linda Vorek vs. Midland Credit Management, Inc. (11296125)
<b>Document(s) Type:</b>	Notice and Complaint
<b>Nature of Action:</b>	Violation of State/Federal Act
<b>Court/Agency:</b>	Warren County Court of Common Pleas, PA
<b>Case/Reference No:</b>	122
<b>Jurisdiction Served:</b>	Kansas
<b>Date Served on CSC:</b>	06/04/2021
<b>Answer or Appearance Due:</b>	20 Days
<b>Originally Served On:</b>	CSC
<b>How Served:</b>	Certified Mail
<b>Sender Information:</b>	Eugene D. Frank 412-366-4276

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## Supreme Court of Pennsylvania

Court of Common Pleas  
Civil Cover Sheet

Warren

County

For Prothonotary Use Only:

Docket No:

122

TIME STAMP

2021 MAR 26 AM 10:14

FILED

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

## Commencement of Action:

- ☒ Complaint      ☐ Writ of Summons      ☐ Petition  
☐ Transfer from Another Jurisdiction      ☐ Declaration of Taking

Lead Plaintiff's Name:

Linda Vorek

Lead Defendant's Name:

Midland Funding LLC et al.

Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits  
(check one) ☒ outside arbitration limitsIs this a *Class Action Suit*? ☐ Yes ☒ NoIs this an *MDJ Appeal*? ☐ Yes ☒ No

Name of Plaintiff/Appellant's Attorney: Eugene D. Frank, Esquire

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

**Nature of the Case:** Place an "X" to the left of the ONE case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

## TORT (do not include Mass Tort)

- ☐ Intentional  
☐ Malicious Prosecution  
☐ Motor Vehicle  
☐ Nuisance  
☐ Premises Liability  
☐ Product Liability (does not include mass tort)  
☐ Slander/Libel/ Defamation  
☒ Other:  
 FDCPA claims

## MASS TORT

- ☐ Asbestos  
☐ Tobacco  
☐ Toxic Tort - DES  
☐ Toxic Tort - Implant  
☐ Toxic Waste  
☐ Other:

## PROFESSIONAL LIABILITY

- ☐ Dental  
☐ Legal  
☐ Medical  
☐ Other Professional:

## CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff  
☐ Debt Collection: Credit Card  
☐ Debt Collection: Other

- ☐ Employment Dispute:  
 Discrimination  
☐ Employment Dispute: Other

☐ Other:

## REAL PROPERTY

- ☐ Ejectment  
☐ Eminent Domain/Condemnation  
☐ Ground Rent  
☐ Landlord/Tenant Dispute  
☐ Mortgage Foreclosure: Residential  
☐ Mortgage Foreclosure: Commercial  
☐ Partition  
☐ Quiet Title  
☐ Other:

## CIVIL APPEALS

- Administrative Agencies  
☐ Board of Assessment  
☐ Board of Elections  
☐ Dept. of Transportation  
☐ Statutory Appeal: Other

☐ Zoning Board☐ Other:

## MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration  
☐ Declaratory Judgment  
☐ Mandamus  
☐ Non-Domestic Relations  
 Restraining Order  
☐ Quo Warranto  
☐ Replevin  
☐ Other:

**IN THE COURT OF COMMON PLEAS  
OF WARREN COUNTY, PENNSYLVANIA**

Linda Vorek,

Plaintiff,

NO: 122

TYPE OF PLEADING:

**Complaint**

vs.

Midland Credit Management, Inc.  
and Midland Funding LLC,

Defendants.

FILED ON BEHALF OF:  
Linda Vorek, Plaintiff

COUNSEL OF RECORD:  
Eugene D. Frank, Esquire  
PA ID # 89862

3202 McKnight East Drive  
Pittsburgh, PA 15237  
(412) 366-4276 (office)  
(412) 366-4305 (fax)  
[efrank@edf-law.com](mailto:efrank@edf-law.com)

2021 MAR 26 AM 10:14

FILED

**IN THE COURT OF COMMON PLEAS OF  
WARREN COUNTY, PENNSYLVANIA  
CIVIL DIVISION**

<p>Linda Vorek,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Midland Credit Management, Inc. and Midland Funding LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.</p>
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**NOTICE TO DEFEND**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

<p>PA Lawyer Referral Services PA Bar Association 100 South Street Harrisburg, PA 17108 Phone (800) 692-7375</p>	<p>Northwestern Legal Services First Niagara Bldg., 4<sup>th</sup> Floor 315 Second Ave., Suite 401 Warren, PA 16365 Phone (800) 665-6957</p>
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**IN THE COURT OF COMMON PLEAS OF  
WARREN COUNTY, PENNSYLVANIA  
CIVIL DIVISION**

<p>Linda Vorek,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Midland Credit Management, Inc. and Midland Funding LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.</p>
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**COMPLAINT**

AND NOW, comes the Plaintiff, Linda Vorek, by and through her undersigned counsel, and files this Complaint, and in support thereof avers as follows:

**Jurisdiction and Venue**

1. Jurisdiction of this Court *generally* arises out of, but not limited to, the Defendants' violation(s) of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter referred to as "FDCPA"), which prohibits debt collectors from engaging in abusive, false, deceptive, misleading and/or unfair practices.
2. At all relevant times herein, Defendants, Midland Credit Management, Inc. and Midland Funding LLC (collectively the "Defendants"), were engaged in the collection of delinquent consumer debts within the Commonwealth of Pennsylvania, including the County of Warren.
3. Venue is proper in Warren County, Pennsylvania pursuant to Pa. R.C.P. No. 2179(a)(2) and/or 2179(a)(3).

**Parties**

4. At all times mentioned herein, Plaintiff, Linda Vorek (the “Plaintiff”), was a natural person, consumer, and citizen of the Commonwealth of Pennsylvania, County of Warren.

5. At all relevant times herein, Plaintiff was allegedly obligated to pay a defaulted consumer debt as specifically set forth herein (the “Debt”).

6. Defendant, Midland Credit Management, Inc. (“MCM”), is a corporation established in the State of Kansas with a business address located at 350 Camino De La Reina, Suite 100, San Diego, CA 92108.

7. MCM conducts business and/or attempts to collect delinquent consumer debts throughout the Commonwealth of Pennsylvania, including the County of Warren.

8. MCM’s principal purpose is the collection of delinquent debts.

9. MCM is a servicer of Midland Funding LLC (“MF”) consumer accounts and regularly attempts to collect related delinquent consumer debts for MF via phone calls to consumers and collection letters to consumers amongst other collection tactics.

10. MF is a limited liability company established in the State of Delaware with a business address located at 350 Camino De La Reina, Suite 100, San Diego, CA 92108.

11. MF conducts business and/or attempts to collect delinquent consumer debts throughout the Commonwealth of Pennsylvania, including the County of Warren.

12. MF’s principal purpose is the collection of delinquent debts.

13. MF’s sole business is the purchasing of delinquent consumer debts with the purpose of attempting to collect on those debts by way of dunning collection letters sent to the consumers, collection telephone calls made to the consumers or third parties in an

attempt to locate said consumers, filing collection lawsuits against consumers in various courts of law, and/or by reporting the delinquent debts to the credit bureaus.

14. MCM and MF are affiliated companies sharing common owners, officers, members, managers, attorneys, and/or employees as well as addresses, phone numbers, consumer files, and/or databases.

15. MCM and MF operate with one another and share information in their efforts to purchase and collect on delinquent consumer debts.

16. MF does not issue credit and/or charge accounts or otherwise extend credit to consumers.

17. At all times mentioned herein, MF directed and/or authorized MCM to act as its agent in the attempts to collect the relevant consumer debt.

18. Defendants are "debt collectors" as defined in the FDCPA and, at all times relevant herein, acted by and/or through their owners, managers, officers, shareholders, authorized representatives, partners, employees, agents, affiants, attorneys, affiliates and/or workmen.

19. MF is vicariously liable for the actions of MCM as well as any other agents or attorneys assigned and/or hired to collect the relevant debt.

20. Defendants (individually and/or collectively) regularly engage in collecting delinquent consumer debts and regularly use the mails and/or the telephone in an attempt to collect, directly or indirectly, delinquent consumer debts allegedly owed or due or asserted to be owed or due another.

**Factual Allegations**

21. At all relevant times herein, the related delinquent and disputed consumer debt was a Credit One Bank, N.A. account with an alleged balance incurred by Plaintiff in the amount of \$1,893.04 (the "Debt").
22. At all relevant times herein, the Debt was a consumer debt as defined in the FDCPA.
23. The Debt was incurred based on purchases related to and/or used primarily for personal, family and/or household purposes, including, but not limited to, personal retail purchases.
24. No part of the Debt was related to business transactions.
25. Prior to 2016, the Debt went into default for nonpayment.
26. No payments were made on the Debt by Plaintiff in 2016 or thereafter.
27. The statute of limitations began to run on any claim related to the Debt from the time the cause of action accrued.
28. Plaintiff did not toll, extend, or otherwise renew the statute of limitations in any manner.
29. As a result, and pursuant to 42 Cons. Stat. § 5525, the statute of limitations had expired with respect to Plaintiff before March of 2020, and likely significantly earlier.
30. Despite the Debt being time-barred, on March 31, 2020, MF via its in-house attorneys commenced legal action against Plaintiff in Magisterial District Court 37-4-01 at Case Number CV-0000018-2020 in an attempt to collect the Debt (the "Lawsuit"). A true and correct copy of the Lawsuit docket is attached hereto and marked as Exhibit "A." All pleadings and/or other documents filed within the Lawsuit are incorporated herein by reference.



31. On or about April 23, 2020, Plaintiff notified the Magisterial District Court of her intent to defend against the Lawsuit.

32. Thereafter, on April 24, 2020, Plaintiff via her attorney notified Defendants (via certificate of mailing) and Defendants' in-house counsel (via certified mail) that Plaintiff was represented by counsel and that Defendants were pursuing.

33. The aforementioned notice of representation was received by Defendants on April 27, 2020 as evidenced by the certified mailing.

34. Despite knowing Plaintiff was represented by an attorney, Defendants knowing these facts nonetheless mailed or, caused to be mailed, directly to Plaintiff a collection letter on or about May 1, 2020 in an attempt to collect the Debt (the "Collection Letter").

35. As a result of a calendar error, Plaintiff's attorney did not attend the rescheduled hearing in the Lawsuit and a default judgment was entered in favor of MF (no decision was made on the merits), which was timely appealed to the Court of Common Pleas of Warren County, Pennsylvania at Case Number 2020-00279 (the "Appeal"). A true and correct copy of the Appeal docket is attached hereto and marked as Exhibit "B." All pleadings and/or other documents filed within the Lawsuit are incorporated herein by reference.

36. Thereafter, MF has intentionally and/or with a reckless disregard parked the Appeal as indicated in the "Answer To Plaintiff's Complaint And New Matter" filed in the Appeal.

37. Defendants were placed on notice multiple times that they were pursuing a time-barred Lawsuit/Appeal given the statute of limitations had expired prior to the Lawsuit being filed.

38. The Appeal remains pending with MF taking no action to move it forward or file a discontinuance rendering its action dilatory, obdurate and/or vexatious conduct.

39. Defendants actions have caused Plaintiff unnecessary stress, anxiety, worry, and annoyance.

**Causes of Action**  
**Count I**  
**Violations of the FDCPA**  
**15 U.S.C. § 1692, *et seq.***

40. Plaintiff incorporates by reference the above paragraphs of this Complaint as though fully set forth herein.

41. There is abundant evidence of the use of abusive, deceptive, and unfair collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies, marital instability and invasions of individual privacy.

42. The FDCPA was enacted, in part, due to existing laws and/or procedures being inadequate for redressing the types of injuries as set forth herein.

43. Defendants knew or should have known that their actions violated the FDCPA.

44. Defendants are subject to strict liability for their actions in attempting to collect the Debt as set forth herein.

45. Defendants could have taken steps necessary to bring their actions within FDCPA compliance, but neglected to do so and failed to adequately review their actions to ensure compliance with the law.

46. Because the list is non-exhaustive, a debt collection practice can be deemed a false, deceptive, materially misleading, or unfair practice even if it does not fall within any of the subsections of Sections 1692d, 1692e, and/or 1692f of the FDCPA.

47. MF violated the FDCPA when it knew or should have known the Debt was time-barred prior to filing the Lawsuit and continued the Lawsuit and Appeal thereafter with complete disregard to Plaintiff's rights.

48. MF also violated the FDCPA when it parked the Appeal as indicated in the "Answer To Plaintiff's Complaint And New Matter" filed in the Appeal.

49. Defendants also violated the FDCPA by directly communicating with Plaintiff via the Collection Letter when they knew or should have known Plaintiff was represented by an attorney.

50. The conduct of Defendants, their agents, servants, representatives, managers, attorneys and/or employees, as described herein was improper, misleading, deceptive, abusive, harassing and/or unfair collection practices in violation(s) of the FDCPA's communication in connection with debt collection practices at 15 U.S.C. § 1692c, harassment and abuse collection practices at 15 U.S.C. § 1692d, deceptive collection practices at 15 U.S.C. § 1692e, and/or unfair collection practices at 15 U.S.C. § 1692f.

51. As a result of Defendants' violation(s) of the FDCPA, Plaintiff is entitled to actual damages, statutory damages and reasonable attorneys' fees and costs.

52. Plaintiff has experienced aggravation, anxiety, annoyance, embarrassment, fear, inconvenience, worry, and/or stress as a direct and proximate result of Defendants' actions.

**WHEREFORE**, Plaintiff respectfully demands that this Court enter a judgment against Defendants in excess of the arbitration limits for the following:

- (a) Actual damages;
- (b) Statutory damages;

- (c) Attorneys' fees, litigation expenses and costs of suit;
- (d) Such other and further relief that this Court deems just and proper.

*Plaintiff, Linda Vorek, demands a trial by jury if removed or appealed as to all issues so triable.*

Respectfully submitted,

**Law Offices of Eugene D. Frank, P.C.**

By: 

Eugene D. Frank, Esquire  
PA ID No. 89862  
3202 McKnight East Drive  
Pittsburgh, PA 15237  
(412) 366-4276 - office  
(412) 366-4305 - fax  
[efrank@edf-law.com](mailto:efrank@edf-law.com)

IN THE COURT OF COMMON PLEAS OF  
WARREN COUNTY, PENNSYLVANIA  
CIVIL DIVISION

Linda Vorek,  Plaintiff,  vs.  Midland Credit Management, Inc. and Midland Funding LLC,  Defendants.	Case No.
---	----------

VERIFICATION

I, Eugene D. Frank, attorney for Plaintiff, Linda Vorek, am fully familiar with the facts set forth in the within *Complaint* and am authorized to make this Verification on behalf of Plaintiff. I verify that the averments of fact contained in the foregoing *Complaint* are true and correct to the best of my knowledge and belief based on the information supplied by Plaintiff, Defendants, and/or Public Records. Plaintiff's verification will be substituted for this attorney verification upon written request.

Dated: March 25, 2021

BY: \_\_\_\_\_

Eugene D. Frank

## Magisterial District Judge 37-4-01

## DOCKET

Docket Number: MJ-37401-CV-0000018-2020

## Civil Docket



Midland Funding LLC  
v.  
Linda Vorek

Page 1 of 3

## CASE INFORMATION

Judge Assigned: Magisterial District Judge Todd A. Woodin  
 Claim Amount: \$1,495.93  
 Judgment Amount: \$1,609.18  
 File Date: 03/31/2020  
 Case Status: Inactive  
 County: Warren

## CALENDAR EVENTS

Case Calendar	Schedule	Start Date	Start Time	Room	Judge Name	Schedule Status
Civil Action Hearing		05/01/2020	10:15 am		Magisterial District Judge Todd A. Woodin	Continued
Civil Action Hearing		07/06/2020	11:00 am		Magisterial District Judge Todd A. Woodin	Scheduled

## CASE PARTICIPANTS

Participant Type	Participant Name	Address
Defendant	Vorek, Linda	Tidoute, PA 163511206
Plaintiff	Midland Funding LLC	Philadelphia, PA 19113

## DISPOSITION SUMMARY

Docket Number	Plaintiff	Defendant	Disposition	Disposition Date
MJ-37401-CV-0000018-2020	Midland Funding LLC	Linda Vorek	Judgment for Plaintiff	07/06/2020

## CIVIL DISPOSITION / JUDGMENT DETAILS

Disposition Date: 07/06/2020      Monthly Rent: \$0.00

Defendant(s)	Plaintiff(s)	Disposition	Joint/Several Liability	Individual Liability	Net Judgment
Linda Vorek	Midland Funding LLC	Judgment for Plaintiff	\$0.00	\$1,609.18	\$1,609.18

Judgment Components:

Type	Amount	Deposit Amount	Adjusted Amount
Civil Judgment	\$1,495.93	\$0.00	\$1,495.93
Filing Fees	\$113.25	\$0.00	\$113.25

\* Is Joint/Several

MDJS 1200

Printed: 03/25/2021 3:53 pm

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**Magisterial District Judge 37-4-01****DOCKET**

Docket Number: MJ-37401-CV-0000018-2020

**Civil Docket**

Midland Funding LLC

v.

Linda Vorek

Page 2 of 3

**ATTORNEY INFORMATION****Private**Name: Daniel Santucci, Esq.Representing: Midland Funding LLCCounsel Status: Active - Entry of AppearanceSupreme Court No.: 092800Phone No.: 866-300-8750Address: Midland Funding LLC  
1 International Plaza Drive 5th Floor  
Philadelphia, PA 19113Entry of Appearance Filed Dt: 03/31/2020Withdrawal of Entry of Appearance Filed Dt:**Private**Name: Eugene David Frank, Esq.Representing: Vorek, LindaCounsel Status: Active - Entry of AppearanceSupreme Court No.: 089862Phone No.:Address: Law Offices of Eugene D. Frank P.C. Attorney At  
Law  
3202 McKnight East Dr  
Pittsburgh, PA 15237Entry of Appearance Filed Dt: 04/29/2020Withdrawal of Entry of Appearance Filed Dt:**Private**Name: Stephanie Hernandez, Esq.Representing: Midland Funding LLCCounsel Status: Active - Entry of AppearanceSupreme Court No.: 324731Phone No.: 866-300-8750Address: Midland Funding LLC  
1 International Plaza Drive 5th Floor  
Philadelphia, PA 19113Entry of Appearance Filed Dt: 03/31/2020Withdrawal of Entry of Appearance Filed Dt:**DOCKET ENTRY INFORMATION**

Filed Date	Entry	Filer	Applies To
07/27/2020	Civil Appeal Filed	Linda Vorek	Midland Funding LLC, Plaintiff
07/06/2020	Judgment for Plaintiff	Magisterial District Court 37-4-01	Linda Vorek, Defendant
07/06/2020	Judgment Entered	Magisterial District Court 37-4-01	Linda Vorek, Defendant
04/29/2020	Entry of Appearance Filed	Eugene David Frank, Esq.	Linda Vorek, Defendant
04/23/2020	Intent to Defend Filed	Linda Vorek	Linda Vorek, Defendant
04/15/2020	Certified Civil Complaint Accepted	Magisterial District Court 37-4-01	Linda Vorek, Defendant
03/31/2020	Certified Civil Complaint Issued	Magisterial District Court 37-4-01	Linda Vorek, Defendant
03/31/2020	Entry of Appearance Filed	Daniel Santucci, Esq.	Midland Funding LLC, Plaintiff
03/31/2020	Civil Complaint Filed	Midland Funding LLC	

MDJS 1200

Page 2 of 3

Printed: 03/25/2021 3:53 pm

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**Magisterial District Judge 37-4-01**

**DOCKET**

Docket Number: MJ-37401-CV-0000018-2020

**Civil Docket**



Midland Funding LLC  
v.  
Linda Vorek

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# Warren County, Pennsylvania

Prothonotary

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3/25/2021 - 3:54 PM

## Functions

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PDF CASE PRINT

E-MAIL CASE PRINT

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## Prothonotary - Inquiry - Dockets Entries

Case No: 2020-00279

Case Type: CIVIL APPEALS - JUDICIAL: OTHER

Filed Date/Time: 07/20/2020 1:43

Caption: MIDLAND FUNDING LLC (vs) LINDA VOREK

Position to Date: 00/00/0000

Position to Page: of 1

Sel	Date	Description	Pages	Img
	07/20/2020	NOTICE OF APPEAL FROM DISTRICT JUSTICE JUDGMENT WITH RULE TO FILE COMPLAINT FILED BY EUGENE FRANK, ATTORNEY FOR DEFENDANT.		
	07/30/2020	PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT AS SERVED UPON ATTORNEY DANIEL SANTUCCI AND DISTRICT JUDGE TODD WOODIN FILED BY EIGENE FRANK, ESQ.		
	08/31/2020	COMPLAINT IN CIVIL ACTION WITH NOTICE TO DEFEND FILED BY DANIEL SANTUCCI, ATTORNEY FOR PLAINTIFF.		
	10/09/2020	CERTIFICATE OF SERVICE OF COMPLAINT AS SERVED UPON EUGENE FRANK, ESQ FILED BY DANIEL SANTUCCI ESQ.		
	03/01/2021	ANSWER TO PLAINTIFF'S COMPLAINT AND NEW MATTER FILED BY EUGENE D. FRANK, ESQUIRE ON BEHALF OF THE DEFENDANT WITH CERTIFICATE OF SERVICE AND CERTIFICATE OF COMPLIANCE.		

Bottom



**IN THE COURT OF COMMON PLEAS OF  
WARREN COUNTY, PENNSYLVANIA  
CIVIL DIVISION**

<p>Linda Vorek,</p> <p><b>Plaintiff,</b></p> <p>vs.</p> <p>Midland Credit Management, Inc. and Midland Funding LLC,</p> <p><b>Defendants.</b></p>	<p>Case No.</p>
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**CERTIFICATE OF COMPLIANCE**

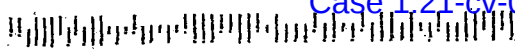
I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Law Offices of Eugene D. Frank, P.C.

Signature: 

Name: Eugene D. Frank

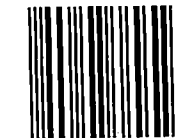
Attorney No. PA ID # 89862



7020 1290 0001 2041 0261



1000



66614

U.S. POSTAGE PAID  
FCM LG ENV  
PITTSBURGH, PA  
15237  
JUN 01, 21  
AMOUNT

**\$8.05**  
R2304E107211-05

**RETURN RECEIPT  
REQUESTED**

LAW OFFICES OF EUGENE D. FRANK  
3202 McKnight East Drive  
Pittsburgh, PA 15237

Midland Credit Management, Inc.  
c/o Corporation Service Company  
2900 SW Wanamaker Drive,  
Suite 204  
Topeka, Kansas 66614

**RETURN RECEIPT  
REQUESTED**